

Message

From: Wu, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=885E149E9BDD4094BF34508D7454CDFA-WU, JENNIFER]
Sent: 7/26/2018 5:56:25 PM
To: Susan Poulsom [Poulsom.Susan@epa.gov]
CC: Stoddard, Jamey [Stoddard.Jamey@epa.gov]; Keenan, Dru [keenan.dru@epa.gov]
Subject: Questions on WA hydro permits - prep for call next Thursday
Attachments: 071618_John_Day_WA0026832_pre_draft_permit.docx

Hi Susan,

As Jamey and I have been working on the hydro permits, there are a few questions we could use your input on. I'm trying to get these issues squared before I send to you and Courtney for internal RW. We have a call next Thursday, and this is to help prep you for that call. If you're able to respond in writing in the permit, that would be great, too. Otherwise, we can discuss at the call next Thursday AM. Attached above is the John Day permit which I'll use as a template for the 8 other IPs.

Permit questions for discussion

1. 316(b), Part II.C. Discussed issues and path forward this morning. Get yea or nay from HQ, then proceed on 316(b) conditions. Note that Corps did not request removing 316(b) conditions, but suggested clarification on some BMPs.
2. TSS Limits and Monitoring, Part 1. Effluent limitations and monitoring. I'm inclined to keep TSS as is which is not to include limits or monitoring in this go around as in the Idaho GP. (There's a BMP in Appendix 9 expected to control any TSS source.)
3. pH monitoring, Part 1. Effluent limitations and monitoring. **Ex. 5 Deliberative Process (DP)**
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4. Monthly temperature monitoring for cooling water, Table 1. I'm inclined to keep as is – no compelling to change requirement.
5. Maintenance Events, Table 2. Note 1. Monitoring is required for some outfalls 1/maintenance event. The Corps commented that they'd like clarification on when they sample during the maintenance event. Ideas on how we define timing to monitor for maintenance event to get a representative sample?
6. Flood events and High Flow events, Table 2. Note 2. There was a comment on defining flood and high flow events. Is there a definition for this?
7. Layout of Tables 1 – 4. Since I'm issuing IPs, the GP format for effluent limits doesn't work. I am combining wastestream types and grouping outfalls and adjusted tables. I think this works, but please check if it's okay
8. EALs, Part II.B.5(e). I'm inclined to have **Ex. 5 Deliberative Process (DP)** requiring EALs. Since these are IPs and the staff at the Corps **Ex. 5 Deliberative Process (DP)** This was also a comment from Columbia River Keepers.